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10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF WASHINGTON

12 PATRICK DUFFY, Individually and on
Behalf of All Others Similarly Situated,

13 Plaintiff,

14 v.

15 ISORAY, INC., DWIGHT BABCOK,
16 and BRIEN RAGLE,

17 Defendants.

NO. 4:15-cv-5046

MOTION FOR ADMISSION *PRO HAC VICE*
OF JOY A. KRUSE

WITHOUT ORAL ARGUMENT

August 14, 2015 at 6:30 p.m.

Joy A. Kruse (the “Applicant”) hereby moves the Court to enter an order permitting her to participate in this case *Pro Hac Vice* as counsel for Movants Hana Sakamoto and James Ewing, pursuant to Local Rule 83.2(c). In support of this Motion, the Applicant states as follows:

1. The Applicant is a partner in the law firm of Lieff Cabraser Heimann & Bernstein, Attorneys at Law, LLP, in San Francisco, California.

MOTION FOR ADMISSION *PRO HAC VICE* OF JOY
A. KRUSE 1

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1 2. The Applicant is a member in good standing of the bars of several United States
 2 federal courts and the highest state courts of California.

3 3. The Applicant responds to the information requested in Local Rule 83.2(c)(2) as
 4 follows:

5 a) The Applicant's address and telephone number are of Lieff Cabraser
 6 Heimann & Bernstein, Attorneys at Law, LLP, 275 Battery St., 29th Floor, San Francisco, CA
 7 94111 telephone (415) 956-1000 ; facsimile (415) 956-1008; email: jakruse@lchb.com.

8 b) The dates of admission to practice before other courts are listed below:

District of Columbia Bar	1984	The District of Columbia Bar 1101 K Street, NW Suite 200 Washington, DC 20005
District of Columbia Court of Appeals	1984	District of Columbia Court of Appeals Committee on Admissions 430 E. St. NW, Room 123 Washington, D.C. 20001
The State Bar of California	1989	The State Bar of California 180 Howard St. San Francisco, CA 94105
California Supreme Court	1989	California Supreme Court 350 McAllister St., Rm 1295 San Francisco, CA 94102

MOTION FOR ADMISSION *PRO HAC VICE* OF JOY
 A. KRUSE 2

1	U.S. District Court, Northern District of California	1989	U.S. District Court, Northern District of California Phillip Burton Federal Building & United States Courthouse Clerk's Office, 16 th Floor 450 Golden Gate Avenue San Francisco, CA 94102
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7	U.S. Court of Appeals, Ninth Circuit	1989	U.S. Court of Appeals, Ninth Circuit The James R. Browning Courthouse 95 7 th Street San Francisco, CA 94103
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10	U.S. Court of Appeals, Federal Circuit	1992	Clerk of Court, U.S. Court of Appeals for the Federal Circuit 717 Madison Place, NW Washington, DC 20439
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14	U.S. Supreme Court	1994	U.S. Supreme Court Clerk, Supreme Court of the U.S. ATTN: Admissions Office One First Street, NE Washington, DC 20543
15			
16			
17			
18	U.S. District Court, Eastern District of California	1997	U.S. District Court, Eastern District of California Robert T. Matsui Federal Courthouse 501 I Street, Room 4-200 Sacramento, CA 95814
19			
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23	U.S. District Court, Eastern District of Wisconsin	2001	United States District Court, Eastern District of Wisconsin 517 East Wisconsin Avenue, Room 362 Milwaukee, WI 53202
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MOTION FOR ADMISSION *PRO HAC VICE* OF JOY
A. KRUSE 3

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1	U.S. District Court, Central District of California	2006	U.S. District Court, Central District of California 312 North Spring Street Los Angeles, CA 90012-4701
2	U.S. District Court, District of Colorado	2006	U.S. District Court, District of Colorado Alfred A. Arraj Courthouse 901 19th Street Denver, CO 80294
3	U.S. Court of Appeals, Second Circuit	2011	Clerk of Court, U.S. Court of Appeals for the Second Circuit Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

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15 c) The name, address and telephone number of admitted counsel with whom
16 the Applicant will be associated are: Darrell W. Scott and Andrew S. Biviano of The Scott
17 Law Group, P.S., 926 W. Sprague Avenue, Suite 680, Spokane, Washington, 99201;
18 telephone (509) 455-3966; facsimile (509) 455-3906; email scottgroup@me.com;
19 darrellscott@me.com; andrewbiviano@me.com.

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21 d) The Applicant's appearance is necessary because Movants have retained
22 her in this action.

23 e) There are no disciplinary sanction actions pending against the Applicant
24 and the Applicant has never been subject to any disciplinary sanctions by any court or Bar
25 Association.
26

MOTION FOR ADMISSION *PRO HAC VICE* OF JOY
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1 4. The Applicant understands that if she is admitted *Pro Hac Vice* she will be
2 subject to the disciplinary jurisdiction of this Court.

3 5. The Applicant is familiar with the facts, issues and documents associated with
4 this case.

5 6. The Applicant is familiar with the local rules of this Court.

7 WHEREFORE, Joy A. Kruse respectfully requests that the Court enter an order
8 granting his admission *Pro Hac Vice* during the pendency of this case.

9 I declare under penalty of perjury under the laws of the United States of America that
10 the foregoing is true and correct.

12 Dated: August 13, 2015

LIEFF, CABRASER, HEIMANN &
BERNSTEIN, LLP

14 By: _____
15 Joy A. Kruse, Esq.

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MOTION FOR ADMISSION *PRO HAC VICE* OF JOY
A. KRUSE 5

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1 STATEMENT OF LOCAL COUNSEL
2

3 I, Andrew S. Biviano, state that Darrell W. Scott and I are co-counsel for Movants Hana
4 Sakamoto and James Ewing in this matter. We will participate in a meaningful manner in
5 preparation and trial of this case and we are authorized and will be prepared to handle this
6 matter, including trial, in the event that the Applicant Joy A. Kruse is unable to be present
7 upon any date assigned by the Court.

8 RESPECTFULLY SUBMITTED this 13th day of August, 2015.
9

10 THE SCOTT LAW GROUP, P.S.
11

12 By: Andrew Biviano
13

14 Darrell W. Scott, WSBA #20241
15 scottgroup@me.com

16 Andrew S. Biviano, WSBA #38086
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18 926 W. Sprague Avenue, Suite 680
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23 *Attorneys for Movants Hana Sakamoto and James Ewing*
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MOTION FOR ADMISSION *PRO HAC VICE* OF JOY
A. KRUSE 6

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